

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

DECLARATION OF PATRICK FINN

[¶ 1] Patrick Finn, being duly sworn, states that I am a Partner of Lighthouse Management Group, Inc., the Chief Restructuring Officer for EPIC Companies Midwest 2023, LLC and EOLA Capital, LLC.

[¶ 2] On or about February 3, 2025, I, on behalf of the debtors, filed a Motion for an Order Authorizing the Debtors to employ Fremstad Law as Special Litigation Counsel for the Debtors. (Doc. ID No. 218). This Court granted the Application to Employ Fremstad Law on or about February 20, 2025 (Doc. ID No. 233).

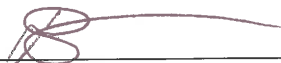
[¶ 3] The original purpose for Special Litigation Counsel was to negotiate and potentially litigate with certain EPIC related projects that involved Sheyenne 32 North, LLC, Sheyenne 32 South, LLC, Sheyenne 32 South Residential, LLC, EPIC Gateway Real Estate Holdings, LLC, EPIC Gateway, LLC, and EPIC Gateway North Real Estate Holdings, LLC, and because of potential other conflicts with the Debtors' primary bankruptcy counsel that may arise. Id., at ¶¶ 8-10.

[¶ 4] A potential conflict matter has arisen with respect to the another Adversary Proceeding related to creditor Cornerstone Bank and as such, I am requesting that Fremstad

Law be permitted to submit fee applications for legal services it performed in the instant matter and other conflict matters that have arisen or will arise.

[¶ 5] I declare under penalty of perjury under the laws of the State of North Dakota, that the foregoing is true and correct. Executed on 9 day of September, 2025.

[¶ 6] FURTHER YOUR DECLARANT SAYETH NAUGHT.



Patrick Finn
Partner, Lighthouse Management Group, Inc.
Chief Restructuring Officer for the Plaintiffs